

Exhibit A

Jerry Maroules, Esq. - ID#023261983
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ATTORNEYS FOR PLAINTIFF

Alicia Michaels,	:SUPERIOR COURT OF NEW JERSEY
	:LAW DIVISION: BERGEN COUNTY
	:
Plaintiff,	:DOCKET NO:
	:
vs.	:CIVIL ACTION
	:
Mitsuwa Marketplace, ABC Corporations	:
(fictitious names) and John Doe I-III	:
(fictitious names)	:
	:
Defendants.	:

COMPLAINT AND JURY DEMAND

Plaintiff, Alicia Michaels, residing in Paramus, Bergen County, New Jersey by way of Complaint against the defendants, hereby alleges and says:

FIRST COUNT

1. On or about October 24, 2019, plaintiff, Alicia Michaels, was at the premises known as Mitsuwa Marketplace located at 595 River Road, Edgewater, Bergen County, New Jersey.

2. Plaintiff, Alicia Michaels, sustained injuries due to a dangerous and hazardous condition created by the defendants when the plaintiff slipped and fell on ice inside the premises which had accumulated on the floor.

3. Upon information and belief, and in the alternative to the allegations in paragraphs 1 & 2 above, the true name of and capacity, whether individual, plural, corporate, partnership, associate or otherwise of defendants, ABC Corporations and John Doe I-III, are unknown to plaintiff. Plaintiff brings suit against said defendants by such fictitious name.

ABC Corporations and/ or John Doe I-III may be the true party or parties responsible for the incident of October 24, 2019, and /or are the parties responsible for any dangerous conditions created on the premises, and for the well-being of plaintiff, Alicia Michaels, but the full extent of those facts linking the fictitiously designated defendants with the cause of action alleged herein is unknown to plaintiff at this time.

4. As a direct and proximate result of the negligence of the defendants, Mitsuwa Marketplace, ABC Corporations and John Doe I-III, their agents, servants, and/or employees, the plaintiff, Alicia Michaels, was caused to fall and sustain serious injury, causing her to suffer great pain and will in the future be caused to suffer great pain; she was caused to incur medical expenses; she was unable to continue with her employment; she will in the future be caused to incur medical expenses; and she was caused to suffer permanent injuries.

5. Defendants had actual and/or constructive notice of the dangerous condition described above and failed to remedy this dangerous condition, take precautionary steps to prevent the accident, and/or give notice to the plaintiff of the dangerous condition, thereby breaching their duty of care to plaintiff.

WHEREFORE, the plaintiff, Alicia Michaels, demands judgment against the defendants, Mitsuwa Marketplace, ABC Corporations and John Doe I-III, jointly and severally for damages, pain and suffering and infliction of emotional distress, together with attorney's fees, interest, costs of suit and any other relief the Court deems just and equitable.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY:

JERRY MAROULES, ESQ.

DATED: July 30, 2020

DEMAND FOR TRIAL BY JURY

Plaintiff hereby demands a trial by jury as to all issues raised in the Complaint.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY:

JERRY MAROULES, ESQ.

DATED: July 30, 2020

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, Jerry Maroules, Esq. (ID#023261983), is hereby designated as Trial Counsel of this matter.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY:

JERRY MAROULES, ESQ.

DATED: July 30, 2020

CERTIFICATION

I certify that pursuant to R. 4:5-1, to my knowledge and based on the information available to me at this time, the matter in controversy is not the subject of any other action pending in any Court, or of a pending arbitration proceeding and that no additional parties are known at this time who should be added except as follows:

There is a pending related worker's compensation claim filed in the New Jersey Division of Workers Compensation under the caption Alicia Michaels vs. On the Shelf with claim petition number of CP 2020-5991.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY:

JERRY MAROULES, ESQ.

DATED: July 30, 2020

DEMAND FOR ANSWERS TO INTERROGATORIES

Pursuant to R. 4:17-1(b), the plaintiff hereby demands that the defendant provide answers to the Uniform Interrogatories set forth in Form C and C(2) of Appendix II of the Rules Governing the Courts of the State of New Jersey.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY:

JERRY MAROULES, ESQ.

DATED: July 30, 2020

Civil Case Information Statement

Case Details: BERGEN | Civil Part Docket# L-004553-20

Case Caption: MICHAELS ALICIA VS MITSUWA MARKETPLACE

Case Initiation Date: 08/05/2020

Attorney Name: JERRY A MAROULES

Firm Name: AGRAPIDIS & MAROULES, PC

Address: 777 TERRACE AVE STE 504

HASBROUCK HGTS NJ 076040000

Phone: 2012880500

Name of Party: PLAINTIFF : Michaels, Alicia

Name of Defendant's Primary Insurance Company

(if known): Sompo International

Case Type: PERSONAL INJURY

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same transaction or occurrence)? NO

Are sexual abuse claims alleged by: Alicia Michaels? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

08/05/2020
Dated

/s/ JERRY A MAROULES
Signed